

REMARKS

Claims 1-18 are all the claims pending in the application. By this Amendment, Applicants amend claims 4 and 9. The amendments to these claims were made for reasons of precision of language and consistency and to better conform them with U.S. patent practice. The amendments, however, do not narrow the literal scope of the claims and thus do not implicate an estoppel in the application of the doctrine of equivalents. In addition, by this Amendment, Applicants add new claims 10-18.

Claim Rejections

Claims 1-9 are rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by E.P. Publication No. 1071288 to Blahut.

Claims 1-9 are also rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Blahut.

For *at least* the followings reasons, Applicants respectfully traverse the rejections.

Claims 1-8

Applicants respectfully submit that claim 1 is patentable over Blahut. For example, claim 1 relates to an information transmission apparatus. The apparatus comprises, *inter alia*, request analyzing means, storage means, information addition means, and information transmission means. The request analyzing means receives an instruction including both a request for transmission of specific information and an identifier identifying an information processing apparatus that has made the transmission request. The information processing apparatus making the transmission request is from among a plurality of information processing apparatus, which

are connected with said information transmission apparatus by way of a common connection line.

The storage means stores array data about arrays. Each array indicates a correspondence between one of a plurality of different pieces of information to be transmitted (to the requesting information processing apparatus) and at least an identifier identifying one of said plurality of information processing apparatus. The information addition means adds the identifier associated with said instruction to the specific information associated with said instruction by referring to said storage means based on analysis results from said request analyzing means. The information transmission means transmits the specific information to which the identifier is added to the information processing device which has provided said instruction to said information transmission apparatus.

The Examiner contends that col. 7, lines 24-27, lines 38-45, col. 8, lines 11-15, paragraphs [0012], [0019], and [0026], along with FIGS. 1-3 of Blahut disclose the above-noted features of claim 1. Applicants respectfully disagree.

For instance, Blahut does not disclose or suggest any storage means for storing array data that indicates a correspondence between one of a plurality of different pieces of information to be transmitted (to the requesting information processing apparatus) and at least an identifier identifying one of said plurality of information processing apparatus. Blahut discloses that the CPU 302 of the optical network unit (ONU) 106 maintains a count of how many active TVs 107 are tuned to the selected program and it stores the selected channel for a TV 107 in a lookup table (Blahut, FIG. 3, col. 7, lines 38-41, col. 9, lines 53-56). That is, the lookup table contains the selected channel and a number of TVs that are tuned into the selected channel, not an identifier of the TV 107 itself. The lookup table is maintained to check whether a channel

requested by a remote control 108 (associated with a TV 107) is already being transmitted by the video server 101, because in this case, the requested channel need not be transmitted by the video server 101 to the ONU 106 again. The TV 107 associated with the requesting remote control 108 can tune into the already supplied video channel (Blahut, col. 2, lines 55-58, and col. 7, lines 41-49). Blahut explicitly states that “only the count of how many of TVs 107 are receiving the selected program channel number is updated” if the selected program channel number is presently being viewed by another active TV 107 (Blahut, col. 10, lines 6-9). As such, there is no disclosure, teaching, or suggestion in Blahut that an identifier of the TV 107 is maintained in the lookup table.

The Examiner also alleges that Blahut’s maintenance of the lookup table discloses the claimed information addition means. The claimed information addition means adds the identifier associated with the (requesting) instruction to the specific information associated with the instruction. Thereafter, the claimed information transmission means transmits the specific information to which the identifier is added to the information processing device which has provided the instruction to the information transmission apparatus. However, as discussed above, no **identifier** of the TV 107 is ever maintained by the lookup table in Blahut. Moreover, the broadcast stream of data (selected video channel) that is transmitted to the TV 107 from the video server 101 via the ONU 106 does not ever have an **identifier** of the subject TV 107 (or the remote control 108) added thereon. Rather the video signal is merely decoded by an MPEG2 decoder 306 in the ONU 106 and then supplied to the TV 107 (Blahut, cols. 7-8, paragraph [0021]).

Since claim 1 recites that the information transmission means transmits the specific information to which the identifier is added to the information processing device which has

provided the instruction to the information transmission apparatus, and because Blahut's video signal of the selected video channel does not have any identifier added thereon when being transmitted to the TV 107, Blahut does not disclose this feature.

Furthermore, Blahut does not teach or suggest that the plurality of information processing apparatuses are connected with the information transmission apparatus by way of a common connection line. The Examiner concedes that Blahut does not explicitly disclose this feature. However, the Examiner contends that the subject feature is extremely well known in the art. The Examiner further states that "the ONU 106 receives transmission requests from a plurality of remote controls and this may be thought of as a common connection. In fact, wireless communication may be seen as being motivated by the same goal of a single common connection line, that of minimizing the need of hardware" (Office Action, page 4, second full paragraph). Applicants respectfully submit that the Examiner is misinterpreting the teachings of Blahut.

As the Examiner correctly points out, the wireless communication in Blahut is carried out between the remote controls and the ONU 106. The remote control 108 associated with a TV 107 sends a control message to the ONU 106 identifying the remote control 108 and a desired video channel (Blahut, col. 7, paragraph [0020]). However, after the subsequent processing of the control message, the selected channel number indicated in the control message is transmitted to the TV 107 via a coaxial cable (Blahut, col. 5, paragraph [0014]). This is not a wireless transfer, which the Examiner is relying on to disclose the claimed common connection line.

Blahut further discloses that the ONU 106 (centralized controller) includes one or more MPEG2 decoders, the number of which depends on a desired number of active TVs to be used in viewing different programs (Blahut, col. 1, line 55 to col. 2, line 4, and col. 2, lines 19-23). The

transmission of the different programs to the active TVs is carried out via different coaxial cables from the ONU 106, as shown in FIG. 1. As such, Blahut does not disclose or suggest that the TVs 107 are connected via a common coaxial line to the ONU 106. Moreover, if a common connection line was used, different programs (i.e., different video signals) could not be transmitted at the same time to different TVs within the same home, which is an object of Blahut's invention (Blahut, Abstract, and col. 7, lines 1-14). In this case, all the TVs at the home would be limited to receiving only one video signal at any given time.

In light of the above discussion, Applicants respectfully submit that Blahut does not anticipate or suggest all the noted features of claim 1 in as complete detail as set forth in the claim. Accordingly, Applicants respectfully request the Examiner to withdraw the 35 U.S.C. § 102(b) and 35 U.S.C. § 103(a) rejection of claim 1.

Since claims 2-8 depend from claim 1, Applicants respectfully submit that claims 2-8 are patentable *at least* by virtue of their dependency. Moreover, claims 3, 4, and 7 are patentable for reasons other than their dependency.

For example, claim 3 recites that when receiving an instruction indicating a request for transmission of specific information, said request analyzing means adds only an identifier associated with said instruction to said array data if a correspondence between the specific information associated with said instruction and at least one identifier is included in the array data stored in said storage means. The Examiner contends that Blahut's Abstract, and col. 7, lines 38-45 disclose this feature. Applicants respectfully disagree.

As submitted above with respect to claim 1, there is no identifier of the TV 107 or the remote control 108 added to the video signal being transmitted to the TV 107. It was also shown above that in Blahut, there is no array data which stores at least one identifier identifying any of

the TVs 107. The lookup table merely keeps a count of the number of TVs tuned into a particular channel.

The Examiner contends that the portions of Blahut which disclose operations of checking whether a requested channel is already being supplied by the video server 101 or not disclose the additional features of claim 3. However, Applicants again point out that no identifier of the TV 107 is ever stored in the lookup table (Blahut, col. 7, lines 38-41, col. 9, lines 53-56, and col. 10, lines 6-9). In the case that a requested channel is already being supplied, Blahut discloses that only the count of how many TVs 107 are receiving the selected program channel number is updated, i.e., no identifier of the requesting TV 107 is added to the lookup table (Blahut, col. 10, lines 6-9). As such, Blahut does not disclose or suggest a request analyzing means that adds only an identifier associated with said instruction to said array data if a correspondence between the specific information associated with said instruction and at least one identifier is included in the array data stored in said storage means. Thus Applicants submit that claim 3 is patentable over Blahut.

Claim 4 recites that when transmitting two or more of different pieces of specific information, the information transmission means performs time division processing according to a number of different pieces of specific information to be transmitted and then transmit them in units of a predetermined transmission unit time. The Examiner contends that FIGS. 1 and 3, and paragraph [0020] of Blahut disclose this feature. The Examiner further asserts that it is inherent that in the distribution of television programs by a provider, two or more different pieces of information or programs will be requested and transmitted according to time (Office Action, page 7, paragraph 8). Applicants respectfully submit that the Examiner is not taking into account each and every one of the recited features of claim 4.

For instance, claim 4 recites that the information transmission means transmits the two or more different pieces of the specific information in units of a **predetermined** transmission unit time. In Blahut, such a feature is not inherent. At most, Blahut discloses that the downstream transmission of video signals is in asynchronous transfer mode (ATM) cells via time division multiplex (TDM) (Blahut, col. 4, lines 33-36). However, nowhere in its disclosure does Blahut teach or suggest that the ATM cells are transmitted to the TVs 107 in units of a **predetermined** transmission unit time.

Claim 7 recites that the common connection line is a **single** cable. The Examiner contends that in Blahut, the transmission link 109 shown in FIG. 1, along with paragraph [0014], and col. 6, lines 1-2 disclose this feature. Applicants respectfully disagree.

Applicants respectfully submit that the transmission link 109 does not disclose or suggest the claimed common connection line. As discussed above with respect to claim 1, for different TVs in a home to be able to view different programs at the same time, they cannot be connected to the ONU 106 via the **same** cable. The claimed common connection line, which in claim 7 is specified as a **single** cable, connects the plurality of the information processing apparatus with the information transmission apparatus. On the other hand, the bi-directional transmission link 109 only connects the video server 101 to the optical line terminal (OLT) 103. This is not the **single** cable which connects the TVs 107 (allegedly the claimed plurality of the information processing apparatus) to the video server 101. There are a multiple number of other cables, such as the fiber lines 110 and 111 (connecting the optical line circuits 104 to the ONU 106), and the different coaxial cables (connecting the ONU 106 to the different TVs 107) in the path between the video server 101 and the TVs 107. As such, Blahut does not disclose or suggest a **single** cable by way of which the TVs 107 are connected to the video server 101.

Claim 9

Claim 9 recites features similar to those discussed above with respect to claim 1.

Therefore, claim 9 is patentable for reasons similar to, but not necessarily coextensive with, those given above with respect to claim 1.

New Claims

New claims 10-18 depend from claim 1 and 9. Therefore, they are patentable *at least* by virtue of their dependency.

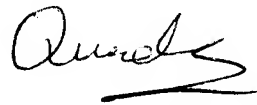
In addition, claims 15 and 17 are patentable for reciting that the plurality of the information processing apparatus are connected to the information transmission apparatus **only** via the common connection line. As discussed above with respect to claims 1 and 7, Blahut does not disclose, teach, or suggest this feature.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Quadeer A. Ahmed
Registration No. 60,835

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: December 13, 2007